

1 WILLIAM G. McDEVITT, Esq. (SBN 62065)
2 Of Counsel, Brayton Purcell, LLP
3 222 Rush Landing Road
4 P.O. Box 6169
5 Novato, CA 94948
6 Telephone: (415) 898-1555
7 Facsimile: (415) 898-1247

8 Attorneys for Plaintiff, RONALD RICHMAN

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA

11 COUNTY OF CONTRA COSTA,

12 Plaintiff,

13 vs.

14 UNITED STATES OF AMERICA, et al.

15 Defendants.

16
17 RONALD RICHMAN,

18 Intervener,

19 vs.

20 UNITED STATES OF AMERICA, et al.

21 Defendants.

22 Intervener, Ronald Richman, hereby alleges:

- 23 1. Intervener is and was at all times mentioned herein a citizen of the State of
24 California, United States of America;
25

) Case No. C07-05317 WHA
) [C08-03499-MEJ; RELATED ACTION]
)
) **[proposed] COMPLAINT IN**
) **INTERVENTION FOR DAMAGES**
) **[F.R.C.P. RULE 24]**
)
) **Date: October 9, 2008**
) **Time: 8:00 a.m.**
) **Place: Ctrm 9, 19th Floor**
) **Before: Hon. William H. Alsup**

2. Plaintiff County of Contra Costa was intervener's employer and intervener was in the course and scope of his employment at all times herein mentioned;
3. Defendant, U.S. Department of Agriculture, Animal and Plant Health Inspection Service, was at all times herein mentioned an agency of defendant, United States of America;
4. The amount in controversy exceeds \$100,000.00, exclusive of interest and costs;
5. Intervener's claims for injuries arose in this district;
6. On or about October 24, 2005, intervener was working in the course and scope of his employment with the County of Contra Costa, State of California. At all times relevant herein, Peter Lacey was an employee of the U.S. Department of Agriculture, Animal and Plant Inspection and Service, and agency of the United States of America;
7. On or about October 24, 2005, intervener was driving a truck in the course and scope of his employment, when Peter Lacey, an employee of an agency of defendant, United States of America, collided with the rear of the vehicle intervener was operating;
8. At said time and place, Peter Lacey, an employee of an agency of defendant, United States of America, negligently, carelessly and recklessly drove his vehicle into the rear of intervener's vehicle which had been stopped on the side of the roadway;

///

///

///

1 9. As a proximate result of the negligence, carelessness and recklessness of
2 defendant, intervener sustained severe and permanent injuries to his neck and
3 shoulder, and resulting in pain, suffering, inconvenience and loss of enjoyment
4 of life.

5 WHEREFORE INTERVENER PRAYS for judgment against defendant as follows:

- 6 1. For medical and related expenses according to proof;
7
8 2. For wage loss and related expenses according to proof;
9
10 3. For general damages in the sum of \$250,000.00;
11 4. For costs of suit;
5. For such other relief as the Court deems proper.

12 DATED: August 20, 2008

LAW OFFICES OF WILLIAM G. MCDEVITT

13
14 By 
15

WILLIAM G. MCDEVITT, Esq.
Attorneys for Intervener
16
17
18
19
20
21
22
23
24
25